

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Newport News Division)**

**JOHN M. PITMAN, III, *et al.*,**

**Plaintiffs,**

**vs.**

**XCENTRIC VENTURES, LLC, *et al.*,**

**Defendants.**

**Civil Action No. 4:16-cv-00179**

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**DEFENDANT ANNA RICHTER'S OBJECTIONS TO PLAINTIFFS' FIRST  
SET OF REQUESTS FOR ADMISSION**

**REQUESTS FOR ADMISSION**

For her objections to Plaintiffs' First Set of Requests for Admission, defendant Anna Richter states as follows:

1. Admit that the audio recording enclosed herein is a true and accurate recording of your conversation with Tracey Richter on February 2, 2014.

**OBJECTION:** Anna Richter objects to this request on the grounds that the audio recording was unlawfully or improperly obtained.

2. Admit that your voice is on the audio recording enclosed herein.

**OBJECTION:** Anna Richter objects to this request on the grounds that the audio recording was unlawfully or improperly obtained.

3. Admit that Tracey Richter's voice is on the audio recording enclosed herein.

**OBJECTION:** Anna Richter objects to this request on the grounds that the audio recording was unlawfully or improperly obtained.


4. Admit that the voice transcribed as "AR" on the audio recording is your voice.

**OBJECTION:** Anna Richter objects to this request on the grounds that the audio recording was unlawfully or improperly obtained.

Dated: May 30, 2017

ANNA RICHTER  
By Counsel

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Bert Pitman & Tracey A. Richter*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2017, I mailed the foregoing via first class mail and sent via email to:


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